

#### 4.13 IMPACTS ON ENVIRONMENTAL JUSTICE AND CHILDREN

The Proposed Action and its alternatives could affect low-income and minority populations or children. An environmental justice analysis is included in this EIS to comply with the intent of Executive Order (EO) 12898 (see Appendix A). An analysis of the potential effects on children is included in this EIS to comply with the intent of EO 13045 (see Appendix A). The ROI for the environmental justice analysis and for the potential effects on children consists of the census tracts in which the Proposed Action and its alternatives are located.

##### 4.13.1 Impacts on Environmental Justice

After environmental justice communities have been identified, the intent of an environmental justice analysis is to recognize any potential disproportionate impacts on those communities. The presence of environmental justice communities does not presuppose that disproportionate adverse impacts will occur in these areas. This section provides a full analysis of the potential impacts of the Proposed Action and its alternatives on census tracts 1, 3, and 12.

##### *Alternatives 2, 4 and 5*

The Sun Golf Course is the only component at the Broadwater site located within an environmental justice community (census tract 12). Under Alternatives 2, 4 and 5, the golf course would be completely redesigned within the footprint of the existing course. No impacts to the surrounding area are expected as a result of the golf course construction, and therefore no disproportionate impacts are expected on low-income and minority populations.

##### *Alternative 3*

Alternative 3 would generate some short-term construction-related impacts, long-term traffic impacts, and visual impacts that are discussed in other sections of Chapter 4.0. These impacts would constitute a disproportionate negative impact due to the proximity of Sites B, C, D, E, and F to the environmental justice communities in which they are located. Further, the removal of local commercial fishing vessels and seafood companies would be required for casino development at Sites D and F.

It is difficult to ascertain the percentage of people living within census tracts 1 and 3 who are dependent upon the maritime industry at Sites D and F. However, it is likely that further reduction in available space to moor the existing commercial fishing fleet, as well to as off-load, pack, and distribute seafood, will have a negative economic impact on those persons who are dependent upon Biloxi's maritime industry. This stress would occur whether or not the persons affected reside in the environmental justice communities included in this analysis.

Past casino developments in Biloxi have exhibited a tendency to acquire adjacent properties for the purposes of expansion. Such activity in the areas surrounding Alternative 3 would be likely to displace local residents who rent homes or apartments adjacent to casinos. This relocation usually requires the residents of the property to vacate Biloxi proper due to the lack of affordable housing and move into more affordable accommodations in more rural settings. The financial costs of this displacement, along with the general burdens associated with relocation, would

constitute a disproportionate negative impact to the environmental justice communities surrounding Alternative 3.

In addition to the impacts outlined above, the entertainment and tourism focus of Alternative 3 would expand the existing visitor draw to Biloxi. The communities would likely see the benefits of commercial spin-off as has occurred in other areas of Biloxi where new casino hotels have been constructed. The positive benefits of Alternative 3 would not pose a disproportionate negative impact on minority or low-income populations.

#### *No-Action Alternative*

Under the No-action Alternative, potential future casino development of the Back Bay within census tracts 1 and 3 could generate increased traffic on the local road network (see Section 4.10). However, the degree to which this or any other future activities would affect the community is dependent upon the nature and intensity of future land uses and cannot be accurately characterized at this time.

#### **4.13.2 Impacts on Children**

EO 13045, Protection of Children from Environmental Health Risks and Safety Risks, seeks to protect children from disproportionately occurring environmental health risks or safety risks that might arise as a result of federal policies, programs, activities, and standards.

The construction of Alternatives 2, 4 and 5 at the Broadwater site would cause an increase in traffic congestion as discussed in Sections 3.10 and 4.10. This increase should not pose an increased safety risk to children because the Broadwater site is primarily within a commercial and non-residential area. The Alternative 3 sites are located in a primarily residential area in which such an increase in traffic would increase safety risks to children. In the event that Alternative 3 is selected, a transportation plan may be required to ensure that hazards due to increased traffic are reduced to pre-construction levels.

Alternatives 2, 4 and 5 would be family-oriented resorts designed to attract adults with children. President Casinos, LLL would follow all hotel and casino industry standard precautions to ensure child safety, including limitations on access to certain areas and provisions regarding adult supervision. None of the alternatives include any industrial or production-oriented activities that would generate substances or pollutants that children may come in contact with or ingest.

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#### **4.13.3 Mitigation**

- Implement a transportation plan to alleviate traffic hazards associated with the execution of Alternative 3.